

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**MAR - 8 2018**

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD RAY WHITE,

Defendant.

**4:18CR208 ERW/DDN**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

1. At some time unknown to the Grand Jury but by at least January 1994 and continuing until at least December 2016 (“the relevant timeframe”), DONALD RAY WHITE (“WHITE” or “the defendant”) devised a scheme and artifice to defraud and to obtain money from Antioch Baptist Church of Hannibal by means of false and fraudulent promises, pretenses and representations.

2. From January 1994 through December 2016, WHITE was the elected treasurer for the Antioch Baptist Church of Hannibal, located in Hannibal, Missouri. As treasurer, WHITE was not entitled to a salary or payment for his services to the church and had access to the church’s bank statements and checkbook. Antioch Baptist Church of Hannibal maintained a checking account at the F&M Bank located in Hannibal, Missouri. WHITE was an authorized signatory on that account. WHITE wrote most of the checks out of the church’s F&M bank

account and made the vast majority of all the deposits into the church's F&M bank account without approval or oversight from other church board members.

3. It was part of the scheme to defraud that WHITE wrote checks from the F&M Bank checking account of Antioch Baptist Church of Hannibal to himself for personal benefit and the benefit of others without the knowledge and authority of the Antioch Baptist Church of Hannibal.

4. It was part of the scheme to defraud that WHITE embezzled approximately \$320,888.00 from Antioch Baptist Church of Hannibal, for his personal benefit, and the benefit of others, during the relevant timeframe.

5. On or about April 19, 2016 within the Eastern District of Missouri, in furtherance of the aforesaid scheme to defraud and for the purpose of executing the scheme,

**DONALD RAY WHITE,**

the defendant herein, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, between F&M Bank's financial computer server located in Western Des Moines, Iowa and the WAL-MART store located within the Eastern District of Missouri, writings, signs and signals, to wit: White presented check #10059 written on Antioch Baptist Church of Hannibal's F&M Bank checking account to WAL-MART in the amount of \$350.00 for personal benefit.

In violation of Title 18, United States Code Section 1343.

**COUNT TWO**

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference Paragraphs 1 through 4 as if fully set forth herein.

2. On or about July 11, 2016 within the Eastern District of Missouri, in furtherance of the aforesaid scheme to defraud and for the purpose of executing the scheme,

**DONALD RAY WHITE,**

the defendant herein, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, between F&M Bank's financial computer server located in Western Des Moines, Iowa and FIDELITY INVESTMENTS located within the Eastern District of Missouri, writings, signs and signals, to wit: White presented check #10121 written on Antioch Baptist Church of Hannibal's F&M Bank checking account to FIDELITY INVESTMENTS in the amount of \$3,000 for personal benefit.

In violation of Title 18, United States Code Section 1343.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1343 as set forth in Counts I and II, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violation(s).
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation(s) or involved in such offense(s), or any property traceable to such property.
3. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. Real Property known as 187 Woodland Trail, Hannibal, MO 63401, Parcel #010.04.18.2.02.003.070;

4. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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DIANNA R. COLLINS  
Assistant United States Attorney